

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,	:	
	:	FILED ELECTRONICALLY
v.	:	
	:	07 Cr. 0124 (WHP)
EMMANUEL ORUCHE, et al.,	:	
	:	NOTICE OF DEFENDANT JOSEPH
Defendants.	:	OLUIGBO'S MOTIONS <i>IN LIMINE</i>
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PLEASE TAKE NOTICE that Defendant Joseph Oluigbo will and hereby does move *In Limine* to exclude at trial: (i) all references to his 1991 drug conviction; (ii) all references to any uncharged crimes or other alleged bad acts, including alleged conduct by Mr. Oluigbo in 2005 that the government has recently disclosed but that is not charged in the indictment; and (iii) all expert and lay opinion testimony by government witnesses purportedly to explain the meaning of conversations captured on wiretaps by the government and the typical structure and operation of heroin trafficking organizations. This Motion is based on this Notice of Motion and the accompanying Memorandum of Law and Declaration of Gordon Eng with attached exhibits, served and filed herewith, and such other matters as may be made or submitted in connection herewith.

We respectfully ask that this Motion be heard at a date and time convenient to the Court.

Dated: New York, New York
May 12, 2008

Respectfully submitted,

/S/ Andrew J. Ceresney

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